April 11, 1985

TO: Coal File, Inspection and Enforcement File

FROM: David Lof, Mining Field Specialist

RE: Genwal Coal Company, Crandall Canyon Mine,

ACT/015/032, #7, Emery County, Utah

On March 20, 1985, I conducted a partial inspection at the above-mentioned mine site. Weather at the time of the inspection was warm and clear.

### Spring and Seep Inventory, NOV N85-4-7-2, #1 of 2

Following my March 6, 1985 partial inspection, I issued the operator Notice of Violation N85-4-7-2, #1 of 2, for their failure to comply with Stipulation 817.52-Ground Water-(2)-DWH. More specifically, their failure to respond to a letter from the Division dated August 17, 1984 requesting additional information on their spring and seep inventory by November 15, 1984. I gave the operator until April 2, 1985 to submit the additional information as requested in the Division's August 17, 1984 letter.

### Crandall Canyon Road, NOV N85-4-7-2, #2 of 2

Following my March 6, 1985 inspection, I issued the operator NOV N85-4-7-2, #2 of 2, for their failure to construct and maintain their roads, within the permit area, in accordance with their approved permit and design standards. The NOV required the operator to bring the roads up to the approved design specifications and maintain existing road drainage structures by April 2, 1985.

At the time of this inspection, the Class I road was still in very poor condition, especially in the section immediately adjacent to the sediment pond and also the truck turnaround area. Most of the road within the permit area was still one-lane and very sloppy.

The Class II road up to the portal pad was in worse condition than it had been previously. There were ruts in the road 9-12 inches deep. The road was impassable to pick-up trucks. However, it did appear that the operator had tried to do some work on the inside ditch of the road, although it was of little or no consequence.

The water bar across the Class I road which directs disturbed area runoff to the sediment pond was functional.

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### Mine Identification Sign

The operator has moved their mine identification sign to approximately Station 67+50 which more accurately depicts the permit area boundary.

### Breached Berm, NOV N85-4-9-1

There were two locations along the berm between the generator and the truck turnaround where the berm had been deliberately breached. Disturbed area runoff was leaving the mine site at both these points and draining down into Crandall Creek, which is approximately 75-100 feet down hill. The amount of flow was approximately five gallons per minute. The runoff was heavily sediment laden. A sample of the runoff was taken and is currently being analyzed by State Health Laboratories. After taking the water samples, I contacted Robert Gent, who was on the mine site, and told him to have the berm repaired immediately.

Because of the disturbed area runoff leaving the site without passing through the sediment pond and the additional contributions of suspend solids to the stream flow, NOV N85-4-9-1 was issued. It reads as follows:

#### Nature of the Violation:

Failure to mine in accordance with an approved permit. Failure to pass all disturbed area runoff through a sediment pond. Failure to maintain sediment controls in order to prevent additional contributions of suspended solids to stream flow or runoff outside the permit area.

## Provisions of the Regulations, Act or Permit Violated:

UMC 771.19

UMC 817.42(a)(1)

UMC 817.45

# Portion of Operation to Which Notice Applies:

The berm separating the disturbed and undisturbed area, from the generator up to the truck turnaround area.

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### Remedial Action Required:

Repair the berm where it is breached.

### Time for Abatement:

Immediately.

The violation was issued that day at 3:50 p.m., to Mr. Gent. By the time I had completed issuing the NOV, the violation had been abated. Therefore, the violation was terminated on March 20, 1985.

### Sewage Facilities, NOV N85-4-5-2, #1 of 2

The above-mentioned violation was issued to the operator on February 22, 1985 for their failure to provide chemical toilets at the mine site in accordance with their approved plan and Forest Service regulations. The operator was required to provide toilets at the mine site by March 8, 1985.

During my March 6, 1985 inspection, Charles Gent informed me that he had contacted a portable toilet contractor and ordered portable toilets for the mine site. However, at the time of my inspection, there were no portable toilets on site.

While discussing the matter with Mr. Gent in the mine office, he said that he had called San-o-let Company about getting a portable toilet on March 5, 1985 and in fact had ordered one with Purchase Order #3997. The company called back about a week and a half to two weeks later and informed Mr. Gent that they could not afford to provide a chemical toilet at the site for the amount of money that they charge. Mr. Gent asked me what they should do. I suggested to him to call Bill Boley of the Forest Service to find out if the Forest Service has any contracts with portable toilet contractors. I then looked in the Utah Business Directory and found three other listings for portable toilet contractors, and told Mr. Gent to call them before calling Mr. Boley. I told Mr. Gent they had one more week to get toilet facilities at the mine site.

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### Mine Operation Facilities, NOV N85-4-5-2, #2 of 2

This violation was issued to the operator on February 22, 1985 for their failure to locate and construct their mine operations facilities in accordance with their approved permanent permit. The operator was required to submit plans for the relocation of the facilities and reclamation of the present facilities location by April 8, 1985.

btb

cc: Charles Gent
Bill Boley
Donna Griffin
Joe Helfrich
John Whitehead

Statistics:

See Knight Mine memo dated April 11, 1985 0379R-14-17